

Clerk's Office  
Filed Date: 7/23/21

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK  
BROOKLYN OFFICE

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GILEAD SCIENCES, INC. and GILEAD :  
SCIENCES IRELAND UC, :  
Plaintiffs, : Case No. 21-cv-4106  
v. :  
SAFE CHAIN SOLUTIONS, LLC; PATRICK : FILED *EX PARTE* AND UNDER SEAL  
BOYD; CHARLES BOYD; WORLDWIDE PURSUANT TO 15 U.S.C. § 1116(d)  
PHARMA SALES GROUP, INC. d/b/a :  
PHARMASALES.COM; ADAM S. BROSIUS; :  
BOULEVARD 9229 LLC; and ISHBAY :  
SHUKUROV, :  
Defendants. :

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**ASSET FREEZE ORDER AGAINST DEFENDANTS**  
**SAFE CHAIN SOLUTIONS, LLC, PATRICK BOYD, CHARLES BOYD,**  
**WORLDWIDE PHARMA SALES GROUP, INC. D/B/A/**  
**PHARMASALES.COM, ADAM S. BROSIUS, 9229 BOULEVARD LLC,**  
**AND ISHBAY SHUKUROV**

PLEASE TAKE NOTICE that upon the Complaint of Plaintiffs Gilead Sciences, Inc. and Gilead Sciences Ireland UC (together, "Plaintiffs"), the memorandum of law submitted in support of this Order, and the accompanying declarations and the exhibits annexed thereto, pursuant to the Court's authority under the Lanham Act, it is hereby ORDERED:

1. Plaintiffs' motion for an asset freeze against Safe Chain Solutions, LLC, Patrick Boyd, Charles Boyd, Worldwide Pharma Sales Group, Inc. d/b/a/ Pharmasales.com, Adam S. Brosius, Boulevard 9229 LLC, and Ishbay Shukurov is GRANTED.
2. Plaintiffs may immediately serve this Order upon any bank, brokerage house, or financial institution in which Safe Chain Solutions, LLC, Patrick Boyd, Charles Boyd,

Worldwide Pharma Sales Group, Inc. d/b/a/ Pharmasales.com, Adam S. Brosius, Boulevard 9229 LLC, or Ishbay Shukurov is known or suspected to hold an account.

3. Safe Chain Solutions, LLC, Patrick Boyd, Charles Boyd, Worldwide Pharma Sales Group, Inc. d/b/a/ Pharmasales.com, Adam S. Brosius, Boulevard 9229 LLC, and Ishbay Shukurov shall be restrained from secreting any assets and from transferring or conveying any assets.

4. All assets held by, for, or on account of Safe Chain Solutions, LLC, Patrick Boyd, Charles Boyd, Worldwide Pharma Sales Group, Inc. d/b/a/ Pharmasales.com, Adam S. Brosius, Boulevard 9229 LLC, or Ishbay Shukurov, and the balance of any account for which any of them has signature authority, shall be frozen and restrained, and any bank, brokerage house or financial institution holding such funds are restrained from releasing them until further order of this Court.

5. Any such bank, brokerage house, or financial institution that freezes and restrains any assets shall also immediately contact Plaintiffs' counsel Geoffrey Potter via email at [CounterfeitHIVMedications@pbwt.com](mailto:CounterfeitHIVMedications@pbwt.com) to disclose the account numbers and titles and amount of assets so frozen.

6. Safe Chain Solutions, LLC, Patrick Boyd, Charles Boyd, Worldwide Pharma Sales Group, Inc. d/b/a/ Pharmasales.com, Adam S. Brosius, Boulevard 9229 LLC, or Ishbay Shukurov may file a motion to lift this asset freeze Order, which Plaintiffs may oppose within three business days.

7. Plaintiffs shall serve a copy of this Order on Safe Chain Solutions, LLC, Patrick Boyd, Charles Boyd, Boulevard 9229 LLC, and Ishbay Shukurov as directed in this Court's seizure order.

8. The Clerk is DIRECTED to provide a copy of this Order to Plaintiffs.

DONE AND ORDERED in Brooklyn, New York on this 23<sup>rd</sup> day of 2021.

Rachel P. Kovner  
*Rachel P. Kovner*  
UNITED STATES DISTRICT JUDGE